



UNITED STATES ENVIRONMENTAL  
PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
ENFORCEMENT AND COMPLIANCE  
ASSURANCE

March 10, 2014

RANDY HIVELY  
ALPERT & ALPERT IRON & METAL, INC.  
1815 S. SOTO ST. PO BOX 23961,  
LOS ANGELES, CA US 90023-4268

Re: Foreign Notice ID: 002-2-1-2014-020  
EPA Notice ID: 008732/12E/13

Dear RANDY HIVELY:

Please find enclosed the Acknowledgment of Consent (AOC) for ALPERT & ALPERT IRON & METAL, INC., LOS ANGELES, CA to export 10000 Metric Tons - (2, 204.6 pounds/ 1, 000 kg) of Spent Lead Acid Batteries: LEAD ACID BATTERIES WET FILLED WITH ACID (EPA hazardous waste numbers D002 , D008 ) to the following foreign receiving facility: WHACHANG CO., LTD., 625-1, GYENAE-RI, CHILSEO-MYEON, HAMAN-GUN, GYEONGSANGNAM-DO , , KR and foreign importer: WHACHANG CO., LTD., 625-1, GYENAE-RI, CHILSEO-MYEON, HAMAN-GUN, GYEONGSANGNAM-DO , , KR This AOC letter is valid from March 23, 2014, to March 22, 2015.

The EPA Waste Import and Export Tracking System ID assigned to this notice is 008732/12E/13.

You will also find enclosed special instructions for the export of hazardous waste. If you have any questions regarding this correspondence, please contact Jana Tatum at telephone: , telefax: , or email: [tatum.jana@epa.gov](mailto:tatum.jana@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Robert G. Heiss".

Robert G. Heiss, Director  
International Compliance Assurance Division

Office of Federal Activities

Enclosures

## ACKNOWLEDGMENT OF CONSENT

March 10, 2014

COMPANY

QUANTITY

**ALPERT & ALPERT IRON & METAL,  
INC.  
LOS ANGELES, CA**

**10000 Metric Tons - (2,204.6 pounds/ 1,000  
kg)**

This document will serve as the EPA Acknowledgment of Consent for **ALPERT & ALPERT IRON & METAL, INC., LOS ANGELES, CA** to export **10000 Metric Tons - (2, 204.6 pounds/ 1, 000 kg) of Spent Lead Acid Batteries: LEAD ACID BATTERIES WET FILLED WITH ACID (EPA hazardous waste numbers D002 , D008 )** to foreign receiving facility **WHACHANG CO., LTD., ,** and foreign importer **WHACHANG CO., LTD., , . This CONSENT is VALID for the period of March 23, 2014 through March 22, 2015.**

Please be advised that a copy of this CONSENT must accompany each shipment of hazardous waste.

Please be advised of the following special RCRA requirements for export shipments of hazardous waste to OECD countries other than Canada or Mexico for recovery. These requirements are found at Title 40 Code of Federal Regulations, Part 262, Subpart H – Transboundary Movements of Hazardous Waste for Recovery within the OECD..

1. If the major terms of the original approved notice should change, you must renotify EPA because the original consent will not cover shipments made under the changed terms. Please send your renotification to: Environmental Protection Agency, Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), 1200 Pennsylvania Avenue, N.W., Washington D.C. 20460, "Attention: OECD Export Notification" prominently displayed on the front of the envelope. (§262.83(b)).
2. A movement document containing all information required for notification as well as additional items specific to each shipment (§262.84(b)) must accompany each shipment from the initiation of the shipment within the United States until it reaches the foreign recovery facility. (§262.84(a))

3. You must file an exception report with the Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460, if within ninety (90) days from the date the waste was accepted by the initial transporter, you have not received written confirmation from the foreign recovery facility that the hazardous waste was received; or if the waste is returned to the United States. (§262.87(b))
4. You must file an annual report by March 1 of each year with the Environmental Protection Agency, Office of Federal Activities, International Compliance Assurance Division (2254A), 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460. (§262.87(a))

All shipments of hazardous waste must conform to all applicable state and federal hazardous waste regulations and transportation requirements, as well as these specific export requirements.

Any questions you may have concerning this Acknowledgment of Consent or other export requirements may be directed to Jana Tatum, EPA, Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), telephone number , fax number , [tatum.jana@epa.gov](mailto:tatum.jana@epa.gov).



## Notification Document for Transboundary Movements of Waste

OECD

<b>1. Exporter</b> Registration N°: Name: Alpert & Alpert Iron & Metal, Inc. Address: 1815 S. Soto St. Los Angeles, CA 90023 Contact person: Karina Krause Tel: (323) 265-4040 x424 Fax: (323) 268-1788 Email: Karina@alpertandalpert.com	<b>3. Notification N°:</b> 8732 12E 13 <b>Notification concerning</b> A.(i) Individual shipment: <input type="checkbox"/> (ii) Multiple shipments: <input checked="" type="checkbox"/> B.(i) Disposal (1): <input type="checkbox"/> (ii) Recovery: <input checked="" type="checkbox"/> C. Pre-consented recovery facility (2,3) Yes <input type="checkbox"/> No <input type="checkbox"/>												
<b>2. Importer</b> Registration N°: Name: Wha Chang Co., Ltd. Address: 625-1 Gyenae-ri, Chilseo-myeon, Haman-gun Gyeongsangnam-do, Korea Contact person: Jeon Cheol-Hyun/ President Tel: 82-055-589-9000 Fax: 82 -055-586-7206 Email: lkwook84@hwachang.kr	<b>4. Total intended number of shipments:</b> 500 <b>5. Total intended quantity (kg / litre) (4):</b> 10,000 MT <b>6. Intended period of time for shipment(s) (4):</b> First departure: 3/23/14 Last departure: 3/22/15 <b>7. Packaging type(s) (5):</b> Pallets <b>Special handling requirements (6):</b> Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>												
<b>8. Intended carrier(s)</b> Registration N°: Name(7): Webtrans Logistics, Inc. Address: 21136 S. Wilmington Ave, #200 Carson, CA 90810 Contact person: Danny Kim Tel: (310) 522-6666 Fax: (310) 522-6665 Email: dannykim@webtransusa.com Means of transport (5):	<b>11. Disposal / recovery operation(s) (2)</b> Recycling D code / R code (5): R4, R6 Technology employed (6): Thermal recovery/recycling of lead, regeneration of acids. Reason for export (1,6): Recycling												
<b>9. Waste generator(s) (1,7,8)</b> Registration N°: CAL000285224 Name: Vertical Manufacturing, LLC Address: 7995 E Prentice Ave, Suite 207E Greenwood Village, CO 80111 Contact person: Randy Hively Tel: (303) 996-5090 Fax (303) 996-5094 Email: randy@verticalmfg.net Site & process of generation (6)	<b>12. Designation and composition of the waste (6):</b> Lead acid batteries UN2794 Batteries Wet filled with Acid, 8, PGIII												
<b>10. Disposal facility (2):</b> <input type="checkbox"/> <b>or Recovery facility (2):</b> <input checked="" type="checkbox"/> Registration N°: Name: Wha Chang Co., Ltd. Address: 625-1 Gyenae-ri, Chilseo-myeon, Haman-gun Gyeongsangnam-do, Korea Contact person: Jeon Cheol-Hyun/ President Tel: 82-055-589-9000 Fax: 82-055-586-7206 Email: lkwook84@hwachang.kr Actual site of disposal/recovery: Same	<b>13. Physical characteristics (5):</b> 2 Solid <b>14. Waste identification (fill in relevant codes)</b> (i) Basel Annex VIII (or IX if applicable): A1160 (ii) OECD code (if different from (i)): (iii) EC list of wastes: (iv) National code in country of export: D002, D008 (v) National code in country of import: (vi) Other (specify): (vii) Y-code: (viii) H-code (5): H8 (ix) UN class (5): 8 (x) UN Number: UN2794 (xi) UN Shipping name: Batteries (xii) Customs code(s) (HS): 8548.10.0540												
<b>15. Countries/states concerned (a), code N° of competent authorities where applicable (b), specific points of exit or entry (c)</b> <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:33%;">State of Export</th> <th style="width:33%;">State(s) of Transit (entry and exit)</th> <th style="width:33%;">State of Import</th> </tr> </thead> <tbody> <tr> <td>(a) See attached list</td> <td></td> <td></td> </tr> <tr> <td>(b)</td> <td></td> <td></td> </tr> <tr> <td>(c)</td> <td></td> <td></td> </tr> </tbody> </table>		State of Export	State(s) of Transit (entry and exit)	State of Import	(a) See attached list			(b)			(c)		
State of Export	State(s) of Transit (entry and exit)	State of Import											
(a) See attached list													
(b)													
(c)													
<b>16. Customs offices of entry and/or departure (European Community):</b> Entry: Departure:													
<b>17. Exporter's / Generator's (1) declaration:</b> I certify that the information is complete and correct to my best knowledge. I also certify that legally-enforceable written contractual obligations have been entered into and that any applicable insurance or other financial guarantee is or shall be in force covering the transboundary movement. Name: Vertical Manufacturing, Inc Signature: Randy Hively Date: November 25, 2013													
<b>18. Number of annexes attached</b> 1													
<b>FOR USE BY COMPETENT AUTHORITIES</b>													
<b>19. Acknowledgement from the relevant competent authority of countries of import / transit (1) / export (9):</b> Country: Notification received on: Acknowledgement sent on: Name of competent authority: Stamp and/or signature:	<b>20. Written consent (1,8) to the movement provided by the competent authority of (country):</b> Consent given on: until: Consent valid from: If Yes, see block 21 (6): <input type="checkbox"/> Specific conditions: No: <input type="checkbox"/> Name of competent authority: Stamp and/or signature:												
<b>21. SPECIFIC CONDITIONS ON CONSENTING TO THE MOVEMENT OR REASONS FOR OBJECTING</b>													

(1) Required by the Basel Convention

(2) In case of R12/R13 or D13-D15 operation, also attach corresponding information on the subsequent R1-R11 or D1-D12 facility(ies) when required.

(3) To be completed for movements within the OECD area and only if B(ii) applies.

(4) Attach detailed list if multiple shipments

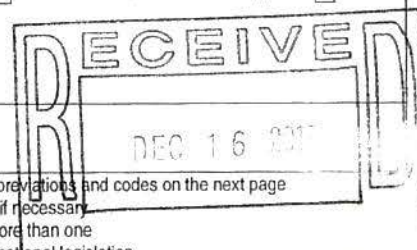
(5) See list of abbreviations and codes on the next page

(6) Attach details if necessary

(7) Attach list if more than one

(8) If required by national legislation

(9) If applicable under the OECD Decision



## List of Abbreviations and Codes Used in the Notification Document

### DISPOSAL OPERATIONS (Block 11)

- D1 Deposit into or onto land, (e.g., landfill, etc.)
- D2 Land treatment, (e.g., biodegradation of liquid or sludgy discards in soils, etc.)
- D3 Deep injection, (e.g., injection of pumpable discards into wells, salt domes or naturally occurring repositories, etc.)
- D4 Surface impoundment, (e.g., placement of liquid or sludge discards into pits, ponds or lagoons, etc.)
- D5 Specially engineered landfill, (e.g., placement into lined discrete cells which are capped and isolated from one another and the environment, etc.)
- D6 Release into a water body except seas/oceans
- D7 Release into seas/oceans including sea-bed insertion
- D8 Biological treatment not specified elsewhere in this list which results in final compounds or mixtures which are discarded by means of any of the operations in this list
- D9 Physico-chemical treatment not specified elsewhere in this list which results in final compounds or mixtures which are discarded by means of any of the operations in this list (e.g., evaporation, drying, calcination, etc.)
- D10 Incineration on land
- D11 Incineration at sea
- D12 Permanent storage, (e.g., emplacement of containers in a mine, etc.)
- D13 Blending or mixing prior to submission to any of the operations in this list
- D14 Repackaging prior to submission to any of the operations in this list
- D15 Storage pending any of the operations numbered in this list

### RECOVERY OPERATIONS (Block 11)

- R1 Use as a fuel (other than in direct incineration) or other means to generate energy
- R2 Solvent reclamation/regeneration
- R3 Recycling/reclamation of organic substances which are not used as solvents
- R4 Recycling/reclamation of metals and metal compounds
- R5 Recycling/reclamation of other inorganic materials
- R6 Regeneration of acids or bases
- R7 Recovery of components used for pollution abatement
- R8 Recovery of components from catalysts
- R9 Used oil re-refining or other reuses of previously used oil
- R10 Land treatment resulting in benefit to agriculture or ecological improvement
- R11 Uses of residual materials obtained from any of the operations numbered R1-R10
- R12 Exchange of wastes for submission to any of the operations numbered R1-R11
- R13 Accumulation of material intended for any operation in this list.

### PACKAGING TYPES (Block 7)

- 1. Drum
- 2. Wooden barrel
- 3. Jerrican
- 4. Box
- 5. Bag
- 6. Composite packaging
- 7. Pressure receptacle
- 8. Bulk
- 9. Other (specify)

### MEANS OF TRANSPORT (Block 8)

- R = Road
- T = Train/Rail
- S = Sea
- A = Air
- W = Inland Waterways

### PHYSICAL CHARACTERISTICS (Block 13)

- 1. Powdery/powder
- 2. Solid
- 3. Viscous/paste
- 4. Sludgy
- 5. Liquid
- 6. Gaseous
- 7. Other (specify)

### H CODE AND UN CLASS (Block 14)

UN Class	H code	Characteristics
1	H1	Explosive
3	H3	Flammable liquids
4.1	H4.1	Flammable solids
4.2	H4.2	Substances or wastes liable to spontaneous combustion
4.3	H4.3	Substances or wastes which, in contact with water, emit flammable gases
5.1	H5.1	Oxidizing
5.2	H5.2	Organic peroxides
6.1	H6.1	Poisonous (acute)
6.2	H6.2	Infectious substances
8	H8	Corrosives
9	H10	Liberation of toxic gases in contact with air or water
9	H11	Toxic (delayed or chronic)
9	H12	Ecotoxic
9	H13	Capable, by any means, after disposal of yielding another material, e. g., leachate, which possesses any of the characteristics listed above

Further information, in particular related to waste identification (block 14), i.e. on Basel Annexes VIII and IX codes, OECD codes and Y codes, can be found in a Guidance/Instruction Manual available from OECD and the Secretariat of the Basel Convention



Annex to Notification Document for Trans Boundary Movement of Waste:

8. Additional Transporters:

a) Aerocosta Global Systems  
510 Plaza Drive, Suite #1540  
College Park, GA 30349  
Contact: David Kim  
E-Mail: [dkim@aerocostausa.com](mailto:dkim@aerocostausa.com)  
Telephone: (404) 684-0501  
Fax: (404) 684-0502  
Means of Transportation: S & R (ocean and road)

b) Pac Anchor Transportation, Inc.  
609 W Cowles Street #665  
Long Beach, CA 90813  
Contact: Frank Hernandez  
Telephone: (562) 437-0157  
Fax: (562) 435-6450  
Email: [frankh@pacanchor.com](mailto:frankh@pacanchor.com)  
Means of transport: S & R (ocean and road)

15. Countries/States Concerned:

US competent authority: USA01

Jana Tatum  
US Environmental Protection Agency  
Office of Enforcement and Compliance Assurance  
Arial Rios Building – Room 6144  
Mail Code 2254A  
1200 Pennsylvania Ave. NW  
Washington, DC 20004  
Phone (202) 564-4269  
Fax (202) 564-0025  
E-mail: [tatum.jana@epa.gov](mailto:tatum.jana@epa.gov)

States (ports) of Export: Los Angeles/Long Beach, CA; Oakland/San Francisco, CA; Seattle/Tacoma, WA; Savannah, GA; Miami, FL; Tampa FL; New York, NY; Houston, TX; Galveston TX; Portland, OR; Baltimore MD; Charleston SC; Boston MA.

Republic of Korea competent authority:

States (ports) of Import: Busan, Republic of Korea  
Nakdong River Basin Environmental Office  
5, Jungang-daero 250 beon-gil, Uichang-gu, Changwon-si, Gyeongsangnam-do,  
Republic of South Korea  
Zip Code: 641-722  
Contact: Mr. Shin Dong-min  
Phone: 82-055-211-1621  
Fax: 82-055-211-1649  
E-Mail: [jjssdm2@korea.kr](mailto:jjssdm2@korea.kr)